

If a generator treats, stores, or disposes of all waste on-site and is subject to part 265 for that activity, (s)he should prepare a facility report - not a generator report. Page 2 of the generator report should read "All regulated quantities of hazardous waste that were generated between January 1 and December 31, 1983 and which were not treated, stored or disposed of on site must be reported on the generator form.

-If a generator treats, stores, or disposes under part 265 and also sends some of the waste off-site, (s)he should prepare a generator report for waste shipped off-site and a facility report for waste treated, stored, or disposed of on-site. If the waste is stored or treated before it is shipped off-site, that waste should appear on both forms and be noted in the comment section of both forms to identify that volume as being counted twice.

-If a generator has only one interim status storage area for wastes accumulated less than 90 days as well as wastes stored over 90 days, (s)he should prepare a facility report showing storage of all wastes and a generator report for any waste shipped off-site, and note in the comment sections on both reports those wastes counted on both forms.

-If a generator only accumulates waste prior to a non-regulated activity, such as recycling for K waste or elementary neutralization on-site, (s)he should complete a generator report (Sections VIII, XIII, and XIV only). In the comment section, (s)he should note "on-site recycling, elementary neutralization, etc."

-If a generator accumulates waste generated after October 1, 1983, (s)he should still report that waste on a separate sheet of the generator form completing only Sections VIII, XIII, and XIV per note on page 5 of the generator report. The generator should write "1983 Generated-stored on site less than 90 days as of December 31, 1983" in the comment Section XIV to show that the wastes were generated and not sent off-site or treated, stored, or disposed of during 1983.

-Section XII-Waste Identification - if the waste described is a lab pack, the generator should list the description "lab pack" and DOT shipping name as well as amount. (S)he should leave the EPA waste numbers blank and attach copies of the manifest so that all wastes numbers won't have to be written on the form, and should add in the "comments" section "See attached manifest copies for waste numbers."

SOURCE: Bob Axelrad. OSW

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